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Attorneys for Jeffrey Lew Liddle Debtor and Debtor in Possession

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X
	: Chapter 11
In re	:
	: Case No. 19-10747 (SHL)
JEFFREY LEW LIDDLE,	:
	: Jointly Administered with 19-12346 (SHL)
Debtor	:
-----	X

**NOTICE OF MONTHLY STATEMENT OF FOLEY HOAG LLP FOR
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES INCURRED AS COUNSEL TO THE DEBTOR AND DEBTOR IN
POSSESSION FOR THE PERIOD FROM
SEPTEMBER 1, 2019 THROUGH SEPTEMBER 30, 2019**

Name of Applicant:	Foley Hoag LLP
Authorized to Provide Services to:	Debtor and Debtor in Possession
Date of Retention:	July 23, 2019, <i>nunc pro tunc</i> to April 27, 2019 [Docket No. 139]
Period for Which Compensation and Expense Reimbursement is Sought:	September 1, 2019 through September 30, 2019
Amount of Compensation Requested:	\$ 32,671.00
Less 20% Holdback:	\$ 6,534.20
Net of Holdback:	\$ 26,136.80
Amount of Expense Reimbursement Requested:	\$ 1,430.39
Total Compensation (Net of Holdback) and Expense Reimbursement Requested:	\$ 27,567.19

In accordance with the *Order Under Bankruptcy Code Sections 105(a) and 331 Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals*, dated September 4, 2019 [Docket No. 166] (the “Interim Compensation Order”), Foley Hoag LLP (“Foley Hoag”) hereby submits this monthly statement (the “Monthly Statement”), seeking compensation for services rendered and reimbursement of expenses incurred as counsel to the Debtor, for the period from September 1, 2019 through September 30, 2019 (the “Monthly Period”). By this Monthly Statement, Foley Hoag seeks payment in the amount of \$27,567.19, which comprises (i) 80% of the total amount of compensation sought for actual and necessary services rendered during the Monthly Period and (ii) reimbursement of 100% of actual and necessary expenses incurred in connection with such services.

SERVICES RENDERED AND EXPENSES INCURRED

1. Attached hereto as **Exhibit A** is a summary of Foley Hoag professionals by individual, setting forth the (a) name and title of each individual who provided services during the Monthly Period, (b) aggregate hours spent by each individual, (c) hourly billing rate for each such individual at Foley Hoag’s current billing rates, (d) amount of fees earned by each Foley Hoag professional, and (e) year of bar admission for each attorney. The blended hourly billing rate of Foley Hoag timekeepers during the Monthly Period is approximately \$463.78.

2. Attached hereto as **Exhibit B** is a summary of the services rendered and compensation sought, by project category, for the Monthly Period.

3. Attached hereto as **Exhibit C** is a summary of expenses incurred and reimbursement sought, by expense type, for the Monthly Period

4. Attached hereto as **Exhibit D** are itemized time records of Foley Hoag professionals for the Monthly Period and summary materials related thereto.

5. Attached hereto as **Exhibit E** is an itemized record of all expenses for the Monthly Period.

6. Attached hereto as **Exhibit F** is a record showing the history of previous fee statements (with amounts paid).

NOTICE AND OBJECTION PROCEDURES

7. Notice of this Monthly Statement shall be given by hand or overnight delivery upon (a) the Debtor, Jeffrey Lew Liddle c/o Liddle & Robinson, L.L.P. 1177 Avenue of the Americas, 5th Floor, New York, New York 10036, (b) William K. Harrington, United States Trustee for Region 2, United States Department of Justice, Office of the United States Trustee, 201 Varick Street, Room 1006, New York, New York 10014, Attn.: Andrea B. Schwartz, Esq. (andrea.b.schwartz@usdoj.gov) (collectively, the “Notice Parties”), and (c) creditors who have made an appearance in the Debtor’s chapter 11 case.

8. Objections to this Monthly Statement, if any, must be served upon the Notice Parties, and by email, hand, or overnight delivery upon counsel to the Debtor and Debtor in Possession, Foley Hoag, LLP, 1301 Avenue of the Americas, 25th Floor, New York, New York 10019, Attn.: William F. Gray, Jr. (wgray@foleyhoag.com) and Alison Bauer (abauer@foleyhoag.com) no later than December 2, 2019 at 4:00 p.m. (prevailing Eastern Time) (the “Objection Deadline”), setting forth the nature of the objection and the specific amount of fees or expenses at issue.

9. If no objections to this Monthly Statement are received by the Objection Deadline, the Debtor shall promptly pay Foley Hoag 80% of the fees and 100% of the expenses identified in this Monthly Statement.

10. To the extent that an objection to this Monthly Statement is received on or before the Objection Deadline, the Debtor shall withhold payment of that portion of this Monthly Statement to which the objection is directed and promptly pay the remainder of the fees and expenses in the percentages set forth above. To the extent such an objection is not resolved, it shall be preserved and scheduled for consideration at the next interim fee application hearing.

Dated: New York, New York
November 22, 2019

FOLEY HOAG LLP

By: /s/ Alison D. Bauer

Alison D. Bauer

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Attorneys for Jeffrey Lew Liddle

Debtor and Debtor-in-Possession

Exhibit A

FOLEY HOAG LLP
Fee Summary for the Period
September 1, 2019 through September 30, 2019

Employee	Year of Admission	Year Fee Incurred	Hourly Rate	Hours Engaged	Total Value
Partners					
Bauer, Alison D.	1996	2019	\$900.00	6.3	\$5,670.00
Gray Jr., William F.	1981	2019	\$925.00	4.7	\$4,347.50
Licker, Michael	2010	2019	\$715.00	0.3	\$214.50
<i>Partner Totals:</i>				11.3	\$10,232.00
Associates					
Fullmer, James S.	2016	2019	\$505.00	23.4	\$11,817.00
Parkinson, Meredith S.	2011	2019	\$595.00	0.5	\$297.50
Teoh, Jin-Wen	2018	201		6.5	\$3,055.00
<i>Associate Totals:</i>				30.4	\$15,169.50
Paralegals					
Kelly, Rachel		2019	\$335.00	12.7	\$4,254.50
Nigro, Carla A.		2019	\$335.00	12.8	\$4,288.00
<i>Paralegal Totals:</i>				25.5	\$8,542.50
Total				63.4	\$32,671.00
Less Discount Applied					(\$3,267.10)
Total Fees					\$29,403.90

Pg 6 of 18
Foley Hoag LLPHours Worked by Task Code and Timekeeper on 36173.00002
Invoice 4009953

Employee		Hours Billed	Amount
B100.B110 Case Administration			
3152	Bauer, Alison D.	1.1	\$891.00
2653	Fullmer, James S.	10.0	\$4,545.00
3153	Gray Jr., William F.	1.4	\$1,165.50
3218	Kelly, Rachel	10.3	\$3,105.45
1065	Nigro, Carla A.	0.2	\$60.30
3116	Parkinson, Meredith S.	0.5	\$267.75
3232	Teoh, Jiun-Wen Bob	5.1	\$2,157.30
B100.B110 Case Administration Total:		28.6	\$12,192.30
B100.B140 Relief from Stay/Adequate Protection Proceedings			
3152	Bauer, Alison D.	0.2	\$162.00
B100.B140 Relief from Stay/Adequate Protection Proceedings Total:		0.2	\$162.00
B100.B150 Meetings of and Communications with Creditors			
3152	Bauer, Alison D.	0.2	\$162.00
B100.B150 Meetings of and Communications with Creditors Total:		0.2	\$162.00
B100.B160 Fee/Employment Applications			
3152	Bauer, Alison D.	0.7	\$567.00
3218	Kelly, Rachel	10.9	\$3,286.35
B100.B160 Fee/Employment Applications Total:		11.6	\$3,853.35
B100.B185 Assumption/Rejection of Leases and Contracts			
2653	Fullmer, James S.	4.3	\$1,954.35
B100.B185 Assumption/Rejection of Leases and Contracts Total:		4.3	\$1,954.35
B100.B190 Other Contested Matters (excluding assumption/rejection motions)			
3152	Bauer, Alison D.	0.9	\$729.00
2653	Fullmer, James S.	3.3	\$1,499.85
3153	Gray Jr., William F.	0.8	\$666.00
3218	Kelly, Rachel	0.3	\$90.45
2187	Licker, Michael	0.3	\$193.05
B100.B190 Other Contested Matters (excluding assumption/rejection motions) Total:		5.6	\$3,178.35
B200.B230 Finance/Cash Collateral			
3152	Bauer, Alison D.	3.2	\$2,592.00
2653	Fullmer, James S.	5.8	\$2,636.10
3153	Gray Jr., William F.	2.5	\$2,081.25
B200.B230 Finance/Cash Collateral Total:		11.5	\$7,309.35
B200.B240 Tax Issues			
3232	Teoh, Jiun-Wen Bob	1.4	\$592.20
B200.B240 Tax Issues Total:		1.4	\$592.20
Grand Total:		63.4	\$29,403.90

Exhibit B

FOLEY HOAG LLP

**Fee Summary for the Period
September 1, 2019 through September 30, 2019**

By Project Category

Project Category	Hours Engaged	Total Value
Assumption/Rejection of Leases and Contracts	4.3	\$1,954.35
Case Administration	28.6	\$12,192.30
Fee/Employment Applications	11.6	\$3,853.35
Finance/Cash Collateral	11.5	\$7,309.35
Meetings of and Communications with Creditors	0.2	\$162.00
Other Contested Matters (excluding assumption/rejection motions)	5.6	\$3,178.35
Relief from Stay/Adequate Protection Proceedings	0.2	\$162.00
Tax Issues	1.4	\$592.20
Total	63.4	\$29,403.90

Exhibit C

FOLEY HOAG LLP

**Expense Summary for the Period
September 1, 2019 through September 30, 2019**

Expense Category	Costs Billed
Express Delivery (FEDEX)	\$155.16
Filing & Recording Fees	\$200.00
In-House B&W Printing - Outsourced	\$22.32
In-House Photocopying	\$0.12
Outside Professional Fees	\$176.80
Stenographic Transcripts	\$828.65
Tabs	\$10.00
Taxi Fare	\$37.34
Total	\$1,430.39

Exhibit D

FOLEY HOAG LLP

Detailed Time Records September 1, 2019 through September 30, 2019

36173.00002

Jeffrey Lew Liddle
Chapter 11 Case

Invoice # 4009953

October 21, 2019

Page 2

This Invoice is for the Period Ending: September 30, 2019

Professional Services Rendered:

Date	Timekeeper	Task	Activity	Narrative	Hours
09/03/19	A. Bauer	B230		Communications on cash collateral and budget.	0.1
09/03/19	A. Bauer	B140		Follow up on M&T and VW motions.	0.2
09/03/19	J. Fullmer	B110		Call with W. Gray regarding state court proceedings.	0.2
09/03/19	J. Fullmer	B110		Attention to state court proceedings.	0.3
09/04/19	A. Bauer	B110		Review of orders and follow up on open issues with internal team.	0.4
09/04/19	A. Bauer	B230		Attention to budget inquiries and review of approved transfers and emails to and from Reiter and A. Akininrade re same.	0.3
09/04/19	J. Fullmer	B110		Attention to state court proceedings.	0.9
09/04/19	J. Fullmer	B185		Attention to lease and contract issues.	0.3
09/04/19	J. Fullmer	B110		Call with W. Gray, B. Teoh, and R. Kelly regarding state court proceedings.	0.6
09/04/19	R. Kelly	B110		Meet with W. Gray, J. Fullmer, and B. Teoh re perfecting appeal, research procedure for filing stipulation to extend time, draft stipulation and circulate.	2.2
09/05/19	J. Fullmer	B110		Call with B. Teoh regarding state court proceedings.	0.1
09/05/19	J. Fullmer	B110		Attention to schedules and statements.	0.3
09/06/19	A. Bauer	B230		Revisions to draft of order (.4); call with Fullmer (.3); review opinion (.3).	1.0
09/06/19	J. Fullmer	B110		Attention to schedules and statements.	0.5

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Jeffrey Lew Liddle
Chapter 11 Case

Invoice # 4009953

October 21, 2019

Page 3

This Invoice is for the Period Ending: September 30, 2019

09/06/19	J. Fullmer	B190	Draft proposed order regarding lien issue.	1.8
09/06/19	J. Fullmer	B190	Calls with A. Bauer regarding proposed order.	0.5
09/06/19	R. Kelly	B110	Retrieve and circulate Memo of Decision re claim of security interest; organize motion to lift stay exhibits	0.5
09/08/19	J. Fullmer	B110	Attention to schedules and statements.	0.4
09/09/19	J. Fullmer	B110	Attention to schedules and statements.	0.1
09/10/19	R. Kelly	B110	Organize and separate case files per A. Bauer.	1.0
09/11/19	A. Bauer	B150	Call with Randy White re court opinion.	0.2
09/11/19	W. Gray Jr.	B110	Review Homestead papers with James Fullmer.	0.5
09/11/19	J. Fullmer	B185	Attention to lease matter.	0.1
09/11/19	R. Kelly	B160	Review billing entries for Fee Application (2.0), emails with A. Akinrinade re same (.3); retrieve and circulate objection filed by CF II (.2); update internal calendar in advance of upcoming hearing, emails re same (.3).	2.8
09/12/19	J. Fullmer	B185	Attention to lease issue.	0.2
09/13/19	A. Bauer	B160	Confer with R. Kelly on fee application time entries.	0.5
09/13/19	C. Nigro	B110	Update case calendar.	0.2
09/16/19	A. Bauer	B110	Review and confer with R. Kelly on pleadings for agenda.	0.2
09/16/19	R. Kelly	B110	Draft agenda in preparation of omnibus hearing; emails with team re same.; update internal calendar; meet with A. Bauer re same.	1.4
09/17/19	R. Kelly	B110	Finalize and efile agenda and prepare binder for omnibus hearing	1.6

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Jeffrey Lew Liddle
Chapter 11 Case

Invoice # 4009953

October 21, 2019

Page 4

This Invoice is for the Period Ending: September 30, 2019

09/17/19	R. Kelly	B160	Review and finalize edits of billing entries in prep of fee application	2.4
09/18/19	R. Kelly	B160	Emails and calls with Billing and Finance depts re fee application	0.5
09/18/19	R. Kelly	B110	Emails with M. Parkinson and review of CourtCall requirements re attendance at omnibus hearing	0.2
09/19/19	A. Bauer	B190	Confer with J. Fullmer for homestead objection.	0.4
09/19/19	A. Bauer	B230	Prepare for and attend hearing on CFII decision and work on revised orders.	1.5
09/19/19	W. Gray Jr.	B230	Prepare for and attend hearing re dispute over nature of order relating to Court's memorandum decision denying secured creditor status to Counsel Financial re lien proceeds; work on revised orders re same.	2.5
09/19/19	J. Fullmer	B185	Draft proposed orders regarding relief granted in omnibus hearing.	2.7
09/19/19	J. Fullmer	B185	Attention to case administration matters.	0.8
09/19/19	R. Kelly	B110	Calls and emails re obtaining transcript of omnibus hearing	0.2
09/20/19	A. Bauer	B160	Attention to monthly fee applications.	0.2
09/20/19	A. Bauer	B190	Analysis of issues regarding adversary proceeding.	0.4
09/20/19	R. Kelly	B160	Emails with A. Bauer and M. Parkinson re fee application; research Pacer for fee application precedents; emails with S. Rosenthal and B. Frerichs re billing data; draft monthly fee applications and circulate for review.	3.4

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Jeffrey Lew Liddle
Chapter 11 Case

Invoice # 4009953

October 21, 2019

Page 5

This Invoice is for the Period Ending: September 30, 2019

09/20/19	R. Kelly	B110	Emails with J. Fullmer re new hearing dates and file Notice of Schedule to docket (.5); schedule team meeting (.1)	0.6
09/22/19	J. Fullmer	B230	Attention to cash collateral matters.	1.0
09/23/19	W. Gray Jr.	B190	Meeting re organization of case agenda.	0.3
09/23/19	J. Fullmer	B230	Draft papers on cash collateral issue.	1.4
09/23/19	J. Teoh	B110	Conference with W Gray and R Kelly to discuss agenda and issues for 9/25 meeting with team.	0.5
09/23/19	R. Kelly	B160	Revise fee applications; emails with M. Parkinson re same (1.4); work with B. Frerichs re fee applications task and expenses break down (.2)	1.6
09/23/19	R. Kelly	B110	Meet with W. Gray and B. Teoh re case status (.5); revise agenda in advance of upcoming team meeting.	1.5
09/24/19	W. Gray Jr.	B190	Work on response to Counsel Financial's objection to the homestead exemption.	0.5
09/24/19	J. Fullmer	B185	Attention to lease matters.	0.2
09/24/19	J. Fullmer	B110	Attention to schedules and statements.	0.6
09/24/19	J. Teoh	B110	Researched excpetions to the occupancy requirement to the homestead exemption.	2.4
09/24/19	J. Teoh	B110	Attempted to contact IRS regarding extension of filing deadline.	0.2
09/24/19	R. Kelly	B190	Emails with W. Gray, J. Fullmer, and A. Reiter re proposed order denying CF2 perfected security interest.	0.3
09/24/19	R. Kelly	B160	Emails with B. Frerichs re fees and expenses	0.2

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Jeffrey Lew Liddle
Chapter 11 Case

Invoice # 4009953

October 21, 2019

Page 6

This Invoice is for the Period Ending: September 30, 2019

09/24/19	R. Kelly	B110	Continue revising agenda in preparation of meeting (1.0); update internal calendar with upcoming hearing dates (.1)	1.1
09/25/19	A. Bauer	B110	Team status meeting.	0.5
09/25/19	W. Gray Jr.	B110	Team Status Meeting with Bauer, Fullmer, Parkinson, Teoh and Kelly.	0.5
09/25/19	M. Licker	B190	Attend team strategy meeting.	0.3
09/25/19	J. Fullmer	B110	Attention to schedules and statements.	1.4
09/25/19	J. Fullmer	B230	Attention to cash collateral matters.	0.1
09/25/19	J. Fullmer	B110	Attend team meeting regarding case status.	0.5
09/25/19	M. Parkinson	B110	Team meeting re status and next steps.	0.5
09/25/19	J. Teoh	B240	Attempted to contact IRS with W Gray to request extension of deadline to fill J Liddle's tax returns.	0.7
09/25/19	J. Teoh	B240	Drafted letter to IRS requesting time to extend deadline for filing tax returns.	0.5
09/25/19	J. Teoh	B240	Revised letter requesting tax return filing deadline extension and coordinated with P Rosehill to effect delivery.	0.2
09/25/19	J. Teoh	B110	Conference with W Gray, A Bauer, J Fullmer, M Parkinson, M Licker and R Kelly to discuss agenda and ongoing issues.	0.5
09/25/19	J. Teoh	B110	Researched whether a second motion to extend exclusivity period would incur a higher burden of proof and whether the exclusivity deadlines can be combined in a jointly administered case.	1.5

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Jeffrey Lew Liddle
Chapter 11 Case

Invoice # 4009953
October 21, 2019
Page 7

This Invoice is for the Period Ending: September 30, 2019

09/26/19	A. Bauer	B230	Various communications regarding amount of funds to be released upon entry of Court order (.2); call with J. Fullmer (.1).	0.3
09/26/19	J. Fullmer	B230	Attention to cash collateral matters.	1.0
09/26/19	J. Fullmer	B230	Call with A. Bauer regarding cash collateral matters.	0.1
09/26/19	J. Fullmer	B110	Attention to schedules and statements.	3.5
09/27/19	A. Bauer	B190	Confer with W. Gray.	0.1
09/27/19	J. Fullmer	B230	Call with W. Gray regarding cash collateral matters.	0.3
09/27/19	J. Fullmer	B230	Attention to cash collateral matters.	1.9
09/27/19	J. Fullmer	B110	Attention to schedules and statements.	0.5
09/30/19	W. Gray Jr.	B110	Review motion for extension of exclusivity.	0.4
09/30/19	J. Fullmer	B110	Call with W. Gray regarding schedules and statements.	0.1
09/30/19	J. Fullmer	B190	Legal research regarding litigation issue.	1.0
Less Discount Applied				(3,267.10)
TOTALS				63.4

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Exhibit E

FOLEY HOAG LLP

Detailed Expense Records

Pg 17 of 18
Foley Hoag LLPCosts Incurred by Cost Code and Timekeeper on 36173.00002
Invoice 4009953

Employee		Costs Billed
029 Express Delivery (FEDEX)		
3152	Bauer, Alison D.	\$136.24
3177	Rosehill, Phillip	\$18.92
029 Express Delivery (FEDEX) Total:		\$155.16
050 In-House Photocopying		
3152	Bauer, Alison D.	\$0.12
050 In-House Photocopying Total:		\$0.12
055 In-House B&W Printing - Outsourced		
3218	Kelly, Rachel	\$22.32
055 In-House B&W Printing - Outsourced Total:		\$22.32
101B Tabs		
3218	Kelly, Rachel	\$10.00
101B Tabs Total:		\$10.00
104 Stenographic Transcripts		
3152	Bauer, Alison D.	\$69.60
3153	Gray Jr., William F.	\$432.35
3218	Kelly, Rachel	\$326.70
104 Stenographic Transcripts Total:		\$828.65
111 Filing & Recording Fees		
2653	Fullmer, James S.	\$200.00
111 Filing & Recording Fees Total:		\$200.00
113 Outside Professional Fees		
3218	Kelly, Rachel	\$176.80
113 Outside Professional Fees Total:		\$176.80
201 Taxi Fare		
1206	Evers, Holly	\$37.34
201 Taxi Fare Total:		\$37.34
Grand Total:		\$1,430.39

Exhibit F

FOLEY HOAG LLP

History of Previous Fee Statements

Fee Statement Period	Amount Requested	Amount Paid	Docket No.
4/27/2019 – 5/31/2019	\$132,105.46		222
6/1/2019 – 6/30/2019	\$116,668.02		223
7/1/2019 – 7/31/2019	\$99,982.04		224
8/1/2019 – 8/31/2019	\$52,018.11		225